

**IN THE DISTRICT COURT OF THE UNITED STATES
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION**

DONNA DORSEY DAVIS, etc.)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO:
)	2:06CV766-MHT
RICHARD M. DORSEY, etc.,)	
and CD&O, LLC, etc.,)	
Defendants.)	

MOTION TO EXTEND DISCOVERY DEADLINE

NOW COMES, the Plaintiff, by and through her attorney of record, Lindsay B. Erwin, and does show unto this Honorable Court the following:

1. The discovery deadline in this matter is set for April 3, 2007.
2. Plaintiff's counsel was unable to take the deposition of Defendant, Richard M. Dorsey, until March 13, 2007. During such deposition, Plaintiff learned the names of certain individuals who have information relevant to the Plaintiffs claims and defenses in this matter.
3. Notice of Depositions for Jo Ann Perry, the book keeper for I-65 Properties, Inc., George W. Walthall, the attorney who prepared all documentation regarding the formation of I-65 Properties, Inc., and Alan Taunton, the certified public accountant for I-65 Properties, Inc., was noticed on the 30th of March, 2007 for said depositions to take place on the 16th of April, 2007.
4. That in no way will the extension of said deadline effect the date of the trial in this matter previously set by this Honorable Court.
5. Plaintiff's counsel can not adequately defend Defendant's premature Motion for Summary Judgment until such time as all relevant information and documentation of discovery is complete.

WHEREFORE, ABOVE PREMISES CONSIDERED, Plaintiff moves this Honorable Court to extend the deadline for discovery for sixty (60) days to allow Plaintiff conduct other depositions to obtain information relevant to this matter.

Respectfully submitted,

//s// Lindsay B. Erwin
Lindsay B. Erwin
ASB-5299-Y59E
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on the 2 day of April, 2007, I electronically filed the foregoing with the Clerk of the Court using electronic filing system which will send information of such filing to the following:

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//s// Lindsay B. Erwin
OF COUNSEL